

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	CRIMINAL NO. SA-14-CR-0790(1)-OLG
VS.	§	
	§	
MARK ANTHONY GRIMES	§	

UNOPPOSED MOTION FOR CONTINUANCE

**TO THE HONORABLE JUDGE OF SAID COURT, UNITED STATES DISTRICT
JUDGE FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:**

Now comes Defendant, MARK ANTHONY GRIMES, by and through his undersigned counsel, and respectfully moves this Honorable Court for an order continuing his scheduled hearings and in support would show the following:

I.

Sentencing for MARK ANTHONY GRIMES is currently set for September 8, 2016.

II.

KERRISA CHELKOWSKI and SAM LOCK need additional time to confer with the Government and to receive and review the Pre-Sentence Investigation Report (PSR). U.S. Probation Officer Maria Holley has also requested a continuance as she will be out of the office next week and needs additional time to complete and send the PSR. Further, Mark Grimes, defendant, has back surgery scheduled for September 29, 2016 and the doctors have indicated there is an 8-week recovery period. Parties are requesting a 90-day or more continuance in order to comply with these matters.

III.

Assistant United States Attorney Tracy Thompson and U.S. Probation Officer Maria Holley are both unopposed to said Motion. This Motion is made not for the purposes of delay, but that justice may be served.

WHEREFORE, PREMISES CONSIDERED, Defendant, MARK ANTHONY GRIMES, respectfully requests this Honorable Court to grant this Motion for Continuance, and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

KERRISA CHELKOWSKI
Law Office of Kerrisa Chelkowski
1017 South Alamo
San Antonio, TX 78210
Office (210) 228-9393
Fax (210) 226-7540

BY: /KERRISA CHELKOWSKI/
KERRISA CHELKOWSKI
STATE BAR NO: 24034373

SAM LOCK
Law Office of Sam Lock
1017 South Alamo
San Antonio TX 78210
Office (210) 228-9393
Fax (210) 226-7540

BY: /SAM LOCK/
SAM LOCK
STATE BAR NO: 24000470

ATTORNEYS FOR DEFENDANT:
MARK ANTHONY GRIMES

CERTIFICATE OF SERVICE

We do hereby certify that a true and correct copy of the foregoing Motion for Continuance was electronically filed with the Clerk of this Honorable Court using the CM/ECF system which will send notification electronically to the United State's Attorney's Office.

SIGNED on this the 2nd day of September, 2016.

BY: /KERRISA CHELKOWSKI/
KERRISA CHELKOWSKI

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	CRIMINAL NO. SA-14-CR-0790(1)-OLG
VS.	§	
	§	
MARK ANTHONY GRIMES	§	

ORDER

On this date came on to be considered Defendant MARK ANTHONY GRIMES
Motion for Continuance, and said Motion is hereby: GRANTED

Signed on this the _____ day of _____, 2016.

UNITED STATES DISTRICT JUDGE